

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PAID SEARCH ENGINE TOOLS, LLC.	§	
	§	
Plaintiff,	§	
	§	Case No. 2:11-cv-306-JRG-CMC
v.	§	
	§	
GOOGLE, INC. and	§	
MICROSOFT CORPORATION,	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	

UNOPPOSED MOTION TO DISMISS WITH PREJUDICE

Plaintiff Paid Search Engine Tools LLC ("PSET") files this Unopposed Motion to Dismiss With Prejudice and shows the Court as follows:

Pursuant to this Court's April 10, 2012 Order (Dkt. 29) this matter is stayed until completion of the reexamination of United States Patent No. 7,974,912. Attached hereto as Exhibit 1 is the recently issued PTO reexamination certificate for the '912 patent, showing all claims cancelled.

Accordingly, PSET respectfully requests that (i) all of PSET's claims in this action against Defendants shall be dismissed with prejudice, and (ii) each Party shall bear its own costs, expenses, and attorneys' fees.

Respectfully submitted,

PAID SEARCH ENGINE TOOLS, L.L.C.

Dated: March 5, 2015

/s/ Elizabeth L. DeRieux
S. Calvin Capshaw, III
State Bar No. 03883900
ccapshaw@capshawlaw.com

Elizabeth L. DeRieux
State Bar No. 05770585
ederieux@capshawlaw.com
CAPSHAW DERIEUX, LLP
114 E. Commerce Street
Gladewater, Texas 75647
(903) 236-9800
(903) 236-8787 (fax)

Attorneys for Plaintiff
Paid Search Engine Tools, LLC

OF COUNSEL:

J. Robert Chambers, Esq.
bchambers@whepatent.com
Paul J. Linden, Esq.
plinden@whepatent.com
WOOD, HERRON & EVANS, L.L.P.
2700 Carew Tower
441 Vine Street
Cincinnati, Ohio 45202-2917
(513) 241-2324
(513) 241-6234 (fax)

Gregory M. Utter, Esq.
gutter@kmklaw.com
W. Jeffrey Sefton, Esq.
jsefton@kmklaw.com
KEATING, MUETHING & KLEKAMP, PLL
One East Fourth Street
Suite 1400
Cincinnati, OH 45202
(513) 579-6400
(513) 579-6457 (fax)

Attorneys for Plaintiff
Paid Search Engine Tools, LLC

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for PSET, met and conferred regarding the relief requested with counsel for Defendants, and this motion is unopposed.

/s/ Elizabeth L. DeRieux

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record, who are deemed to have consented to electronic service are being served this 5th day of March, 2015, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Elizabeth L. DeRieux